

# **EXHIBIT K**

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON - TACOMA

SARAH HOOVER,

Debtor,

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SARAH HOOVER,

**Plaintiff,**

V.

QUALITY LOAN SERVICE CORPORATION  
OF WASHINGTON, PHH MORTGAGE  
CORPORATION DBA PHH MORTGAGE  
SERVICES, HSBC BANK USA, N.A. AS  
TRUSTEE OF THE FIELDSTONE  
MORTGAGE INVESTMENT TRUST, SERIES  
2006-2, NEWREZ, LLC, IH6 PROPERTY  
WASHINGTON, LP, DBA INVITATION  
HOMES.

## Defendants.

To: All parties, through counsel:

PLEASE TAKE NOTICE that Plaintiff Sarah Hoover, by her undersigned counsel, hereby gives notice pursuant to Fed. R. Civ. 30(b)(1) that she intends to take the oral deposition of Defendant PHH Mortgage Corporation's employee(s) who are responsible for:

**NOTICE OF DEPOSITION - 1**

**HENRY & DEGRAAFF, PS**  
787 MAYNARD AVE S.  
SEATTLE WA 98104  
(206) 330-0595/F (206) 400-7609

1        - Establishing a policy and/or procedure regarding remedying stay violations where a  
2        property is foreclosed after a chapter 7 bankruptcy is filed;

3        - Establishing a policy and/or procedure regarding the notice of a borrower's bankruptcy  
4        filing;

5        - Establishing a policy and/or procedure regarding the processing of a third party  
6        authorization after a bankruptcy filing;

7        - Establishing a policy and/or procedure regarding the processing of a notice from an  
8        unauthorized third party for a borrower's bankruptcy filing;

9        - Establishing a policy and/or procedure regarding the notice of a bankruptcy filing from  
10        a confirmed successor in interest;

11        - Any training given to employees to remedy stay violations;

12        - Any training given to employees to address foreclosures following a bankruptcy filing;

13        - The creation of Risk Convergence Reports between January 1, 2019 and December 31,  
14        2020 regarding the loan at issue in this lawsuit;

15  
16        The deposition will be taken upon oral examination at the instance and request of the Plaintiff  
17        in the above-entitled and numbered action before a notary public or other official authorized to  
18        administer oaths at Anderson Santiago, PLLC, 787 Maynard Avenue South, Seattle, WA  
19        commencing on March 25, 2020 at the hour of 9:30 am.<sup>1</sup> The oral examination is subject to  
20        continuance or adjournment from time to time or place until completed.

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23        <sup>1</sup> Plaintiff has designated the time and place identified here solely for the purpose of noting this  
deposition. Plaintiff is willing to modify the scheduled deposition to a time, date, and location  
convenient to the witness and parties.

1 Said deposition will be taken before a qualified notary public and is subject to continuance  
2 and/or adjournment from time to time or place to place until completed. The notary public or duly  
3 authorized officer qualified to administer oaths, and may be recorded by a videographer, at the  
4 date, time, and location indicated above. Plaintiff also provides notice to the Defendants and  
5 deponent that the deposition may be used at the time of trial.

6 This notice was served on the following counsel for the Defendant PHH for whom the  
7 deponent acts as an employee:

8 Robert W. Norman, Jr.  
9 HOUSER, LLP  
10 600 University St, Ste 1708  
Seattle, WA 98101  
bnorman@houser-law.com

11 Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as  
12 Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2 and NewRez, LLC

13 **YOU ARE FURTHER COMMANDED** to bring with you at said time and place, any  
14 and all documents which you have reviewed and/or relied upon in preparation for your deposition  
15 testimony.

16 DATED this 23 day of February 2021.

17 **HENRY & DEGRAAFF, PS**

18 By: /s/ Christina L Henry  
19 Christina L Henry, WSBA No. 31273  
20 Attorney for Plaintiff  
787 Maynard Ave. S.  
Seattle, WA 98104  
(206) 330-0595  
(206) 400-7609 (fax)  
chenry@hdm-legal.com

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22  
23  
NOTICE OF DEPOSITION - 3

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SEATTLE WA 98104  
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